

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D. C.**

In the Matter of)	
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	
Implementation of the Local Competition)	CC Docket No. 96-98
Provisions of the Telecommunications Act)	
of 1996)	
)	
Telephone Number Portability)	CC Docket No. 95-116
)	

**COMMENTS OF THE PUBLIC SERVICE
COMMISSION OF THE STATE OF MISSOURI**

The Public Service Commission of the State of Missouri (“MoPSC”) offers the following comments in response to the Federal Communication Commission’s (“Commission”) Public Notice (Notice) issued in the above docketed cases. On March 14, 2002, the Commission released a Third Order on Reconsideration in CC Docket No. 99-200, Third Further Notice of Proposed Rulemaking in CC Docket 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 95-116 (Order or FNPRM). In its Order, the Commission, by its own motion, reconsidered its findings in the *Numbering Resource Optimization Third Report and Order* (NRO) regarding the local number portability (LNP) and thousands-block number pooling requirements for carriers in the 100 largest Metropolitan Statistical Areas (MSAs).¹ In the NRO, the Commission determined that these requirements extend to all carriers within the largest 100 MSAs, regardless of whether they

¹ Numbering Resource Optimization, *Third Report and Order and Second Order on Reconsideration in CC Docket No. 99-200*, FCC 01-362, para. 125 (rel. Dec. 28, 2001) (*Numbering Resource Optimization Third Report and Order*).

have received a request from another carrier to provide LNP. In the FNPRM, the Commission seeks comment on whether LNP requirements should extend to all carriers in the largest 100 MSAs, regardless of whether they receive a request to provide LNP and whether all carriers in the top 100 MSAs should be required to participate in thousands-block number pooling, regardless of whether they are required to be LNP capable.

The Commission previously found that number portability contributes to the development of competition among alternative providers by allowing customers to respond to price and service changes without changing their telephone numbers.² The Commission also found that a lack of LNP could deter competitive entry of local service providers because of the value customers place on retaining their telephone numbers.³ In its NPRM, the Commission notes that in the past it was widely accepted that carriers without LNP capability could not participate in pooling, but continues that carriers have since represented that the underlying local routing number (LRN) architecture is necessary for pooling, but not full LNP capability.⁴

The MoPSC agrees with the Commission that numbering optimization measures, such as thousands-block number pooling, provide the greatest benefits to competition when that participation is maximized to its greatest potential. Further, the MoPSC supports the Commission's tentative conclusion that expanding the pooling requirement to all carriers without regard to whether they are otherwise required to provide number portability will promote further numbering resource optimization. Therefore, the MoPSC suggests the Commission reaffirm its decision in the Order, thus extending LNP and thousands-block pooling requirements to all carriers within the largest 100 MSAs, regardless of whether they have received a specific request from another carrier.

² *Number Portability First Report and Order*, 11 FCC Rcd at 8368.

³ *Third Order on Reconsideration in CC Docket No. 99-200, Third Further Notice of Proposed Rulemaking in CC Docket 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 95-116*, at footnote 12.

⁴ *Id.* at para 9.

Respectfully submitted,

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